

08/22/2021

AO 91 (Rev. 11/11) Criminal Complaint

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Israel Jose JUAREZ Jr.

Case No. 2:21-MJ-1038

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 21, 2021 in the county of Kenedy in theSouthern District of Texas, the defendant(s) violated:*Code Section*

8 United States Code 1324

Offense Description

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on the attached sheet.


Complainant's signature

Jordan L. Detter, Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to,
signature attested telephonically per Fed.R.Crim.P.4.1,
and probable cause found August 22 2021
Judge's signature

Jason B. Libby, U.S. Magistrate Judge

Printed name and title

City and state: Corpus Christi, Texas

AFFIDAVIT

On August 21, 2021, at approximately 1:35 A.M., Israel Jose JUAREZ Jr. approached Border Patrol Agent (BPA) K. Clifford in the primary lane at the Javier Vega Jr. Border Patrol (BP) Checkpoint, Sarita, Texas in a Red International Tractor Truck hauling a white Hyundai Trailer. Assisting BPA Clifford with his duties was BPA B. Morales and his canine partner Asja.

BPA Clifford began an immigration inspection of Israel Jose JUAREZ Jr. by asking JUAREZ how he was doing and how many people were in the cab. JAUREZ responded, "two". At this point, the second passenger presented herself, from the sleeper area of the cabin. BPA Clifford looked down towards the end of the trailer and BPA Morales advised him that canine Asja had alerted to the rear of the tractor trailer.

Once in the secondary inspection area, BPA's opened the rear of the trailer where twenty subjects were discovered. BPA L. Martinez determined that all twenty individuals who were concealed in the trailer were illegally present in the United States. Among the twenty individuals was a sixteen-year-old who was traveling without a guardian.

At this time, all subjects were placed under arrest and escorted into the Javier Vega Jr. Border Patrol Checkpoint. Upon their arrest, both Israel Jose JUAREZ Jr. and the female passenger decided not to give statements. Later in the early morning hours JUAREZ knocked on the glass of his cell and stated to BPA J. Munoz he wanted to make a statement. BPA Munoz told JUAREZ to wait until Homeland Security Investigations (HSI) arrived at the Javier Vega Jr. BP Checkpoint.

Corpus Christi, Texas HSI Special Agents (SAs) responded to Javier Vega Jr. BP Checkpoint, Sarita, Texas to interview the subjects.

SA Detter and SA Zuniga advised Israel Jose JUAREZ Jr of his Miranda Rights via ICE Form 73-025 and JUAREZ signed the form indicating he understood his rights and was willing to make a statement without a lawyer present.

JUAREZ stated that he has been driving tractor trucks for a while and is very familiar with the procedures of the company that he works with. JUAREZ stated that he headed to the warehouse in Pharr, Texas with his tractor truck around 4:00 P.M. on August 20, 2021. JUAREZ stated that he arrived at the warehouse at approximately 4:45 P.M. to pick up the loaded trailer. JUAREZ stated that once he picked up the trailer he went to the Loves gas station in Donna, Texas where he bought tape and the orange cable seals that were found on the trailer. JUAREZ stated that he left the Loves gas station at approximately 6:00 P.M. and made his way to the Valero at 2500 W Expressway 83 in San Benito, Texas. JUAREZ stated that he left the tractor truck at the Valero where his cousin came and picked him up. JUAREZ stated that he and his cousin drove around until dark. JUAREZ stated his cousin asked if he wanted to make money and JUAREZ answered yes. JUAREZ stated he was going to be paid \$2,000 USD per person and that he was told he would be smuggling 10 people to Riviera, Texas.

JUAREZ stated his cousin took him back to the tractor truck at dark. JUAREZ stated that the female passenger showed up at the truck around 10:00 P.M. JUAREZ stated that the female passenger stayed in the sleeper portion of the tractor truck. JUAREZ stated that the truck was loaded with people after the female got to the truck. JUAREZ explained that she didn't see any of the individuals because she was in the sleeper. JUAREZ stated that the truck was finished being loaded with people at approximately 11:30 P.M.

JUAREZ stated he was told to wait and go through the checkpoint at approximately 2:00 A.M. JUAREZ stated that he departed the Valero gas station at approximately 12:30 A.M. JUAREZ stated that he did not make any stops until he was encountered at the Javier Vega Jr. BP Checkpoint. JUAREZ stated this is his first smuggling attempt with his cousin.

SA Detter and SA Zuniga advised the female passenger of her Miranda Rights via ICE Form 73-025 and the female passenger signed the form indicating she understood her rights and was willing to make a statement without a lawyer present.

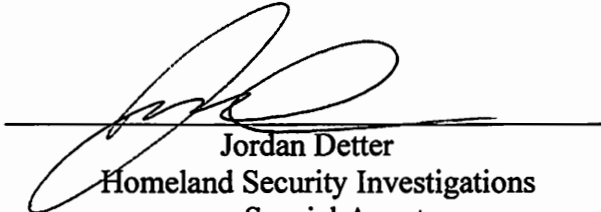
The female passenger stated that on August 20, 2021, she had been with her daughter all day shopping. The female passenger stated that JUAREZ had called her and asked if she wanted to go on a trip. The female passenger stated she agreed and had her daughter take her to a Circle K gas station between San Benito, Texas and Harlingen, Texas. The female passenger stated that her daughter dropped her off at the tractor truck at approximately 10:00 P.M. The female passenger stated that she was not feeling well and went to the sleeper portion of the tractor truck. The female passenger stated that she spent most of the time in the sleeper and was considering not going because she wasn't feeling well. The female passenger stated that she was not sure of the time that JUAREZ and she had left because she fell asleep in the sleeper and did not wake up until JUAREZ told her they were at the checkpoint. The female passenger stated that she came out of the sleeper so that the BPA could see her.

Josue ROSADO-Toro (ROSADO), a material witness and citizen of Honduras, stated he crossed the Rio Grande River approximately one month ago. ROSADO stated his mother made arrangements with an unknown smuggler for ROSADO to be smuggled to Boston for an unknown amount of money. An unknown male smuggler picked up ROSADO near the river and transported him by car to a home. ROSADO remained at the home until August 20, 2021. ROSADO stated he was alone at the home and there was plenty of food in the fridge. On August 20, 2021, an unknown male smuggler picked up ROSADO and transported him to another home. ROSADO was at the home for a few hours. The unknown male smuggler transported ROSADO by car to an unknown location where a truck and trailer were parked. ROSADO as per instructions from driver of car, ROSADO entered the trailer. ROSADO stated the trailer doors were open and other people were already inside. ROSADO stated boxes of cargo were also inside the trailer. ROSADO stated he was the last one into trailer and once inside the doors quickly closed. ROSADO stated the tractor truck then departed and made no stops until arriving at Javier Vega Jr. BP checkpoint. ROSADO claims he never saw the driver of the tractor truck.

Alfonso VELASQUEZ-Carbajal (VELASQUEZ), a material witness and citizen of Mexico, stated his daughter made arrangements for him to be smuggled to Raleigh, North Carolina for an unknown amount of money. VELASQUEZ stated he left his home in Mexico on or about August 4, 2021, and traveled to Matamoras, Mexico. VELASQUEZ stated he remained in Matamoras, Mexico until approximately August 7, 2021, when he entered the United States illegally by crossing the Rio Grande River with 5 other people and 2 brush guides. VELASQUEZ stated the 5 people he crossed with were split up and he was taken to a trailer where he stayed with 5 other people. VELASQUEZ stated he stayed at the trailer until the day he was arrested. VELASQUEZ stated an unknown man and women would take them food twice a day, and VELASQUEZ claims the trailer had running water and electricity. VELASQUEZ stated he was instructed not to leave the trailer and some people would come and go.

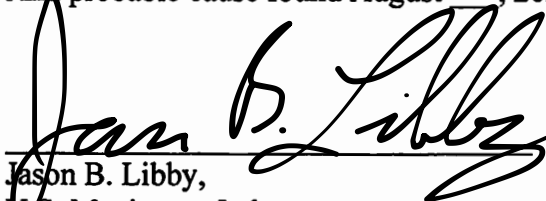
VELASQUEZ explained on the day of his arrest, an unknown man arrived in an SUV and picked up 5 people and drove them to the trailer. VELASQUEZ stated he could not see anything around the trailer and was unable to describe where the trailer was parked. VELASQUEZ stated when he arrived at the trailer, there was a man standing near the trailer doors and the doors were open. VELASQUEZ stated he entered the trailer and was instructed not to speak, to go to the back of the trailer on top of the boxes and turn off all phones. VELASQUEZ stated there were already people inside the trailer when he arrived, and several people arrived later to enter the trailer. VELASQUEZ stated after about 40 minutes, the trailer doors were closed, and the tractor trailer began to move. VELASQUEZ stated the tractor trailer then travelled and made no stops until arriving at the Border Patrol Checkpoint.

AUSA Yifei Zheng was notified of these facts and agreed to prosecute Israel Jose JUAREZ Jr. for violation of Title 8 USC 1324. VELASQUEZ-Carbajal and ROSADO-Toro were held as Material Witnesses.



Jordan Detter
Homeland Security Investigations
Special Agent

Submitted by reliable electronic means, sworn to,
Signature attested telephonically per Fed.R.Crim.P.4.1,
And probable cause found August 22, 2021



Jason B. Libby,
U.S. Magistrate Judge